

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

RHODE ISLAND COMMERCE CORPORATION
(F/K/A RHODE ISLAND ECONOMIC
DEVELOPMENT CORPORATION), WELLS FARGO:
SECURITIES, LLC, PETER M. CANNAVA,
KEITH W. STOKES, and JAMES MICHAEL SAUL,

Defendants.

Pursuant to Fed. R. Civ. P. 41(a)(2), and as part of a settlement submitted for the Court’s approval on March 18, 2019, plaintiff Securities and Exchange Commission (the “Commission”) hereby moves to dismiss certain of its claims as to defendant Wells Fargo Securities, LLC (“Wells Fargo”), who has signed a Consent agreeing to neither admit nor deny certain other securities law violations, and has agreed to a Final Judgment imposing sanctions against it. Specifically, the Commission moves to dismiss counts 2 and 6 of the Amended Complaint, alleging that Wells Fargo violated Section 17(a)(3) of the Securities Act of 1933 and Rule G-32 of the Municipal Securities Rulemaking Board. The Commission’s motion relates only to the portion of Count 2 that concerns conduct of defendant Wells Fargo. The Commission’s counsel has conferred with counsel for Wells Fargo, and Wells Fargo assents to this motion.

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Dated: March 18, 2019

Respectfully submitted,

SECURITIES AND EXCHANGE COMMISSION,
By its counsel,

/s/ Kathleen Shields

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CERTIFICATE OF SERVICE

I hereby certify that, on March 18, 2019, a true and correct copy of the foregoing document was filed through the Court's CM/ECF system, and accordingly, the document will be sent electronically to all participants registered to receive electronic notices in this case.

/s/ Kathleen B. Shields

Kathleen B. Shields